

Exhibit B

April 12, 2023

BY EMAIL

Robert J. McCallum
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Re: *In re Google Digital Advertising Antitrust Litig.*, 1:21-MD-03010 (PKC)

Dear Rob:

We write regarding two issues: 1) the approximately 800,000 documents Google has produced to the Department of Justice and several state attorneys general but not to the plaintiffs in these actions; and 2) Google's commitment in its response to plaintiffs' RFP 300 to "produce documents produced to it by third parties in response to subpoenas Google has issued." Def.'s Resp. and Obj. to Pls.' First Set of Requests for Prod. ("Responses") at 326 (Feb. 27, 2023).

First, we request that Google produce to plaintiffs by **April 17, 2023** the approximately 800,000 documents it produced to the Department of Justice in the DOJ's ad tech investigation that have yet to be produced in these Actions. During a meet and confer on March 23, Google took the position that production of those documents must await a discussion regarding the formatting of that production. Plaintiffs made clear, however, both on the March 23 meet and confer and again in a letter to Google on March 28 that "Plaintiffs [will] accept those documents, as formatted for the DOJ" and asked that Google "produce them forthwith." Ltr. from W. Noss to R. McCallum at 2 (Mar. 28, 2023). On a March 31 meet and confer – despite plaintiffs' clear and repeated requests for immediate reproduction of the 800,000 documents in the format they were produced to DOJ – Google again stated that production must await further discussion of the production format. Yet nearly two more weeks have passed, and Google still has not identified any issue to discuss regarding production format. Plaintiffs reiterate that no further discussion is necessary – we will accept all approximately 800,000 documents in the format in which they were produced to DOJ, subject to plaintiffs' right under Appendix E of the ESI Order to request more readable versions of those documents if necessary.

Second, in its response to plaintiffs' RFP 300, Google agreed to produce all documents produced to it pursuant to subpoenas that Google issues in these Actions. Responses at 326. We understand that Google has already received several thousand documents in response to some of its subpoenas. *See Hr'g Tr.* (Mar. 24, 2023) at 8:5-9, *United States v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.). We request that Google produce those documents it has received to date in response to its subpoenas in these actions by **April 17, 2023**. We further request that Google produce to all plaintiffs any documents it receives in the future in response to subpoenas in these Actions within seven days of receiving them.

Regards,

Plaintiffs' Discovery Committee

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